



Florida Fruit & Vegetable Association

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December 31, 1997

Glenn R. Rogers, Chairman of the Board
Don M. Sleight, Vice Chairman
Michael J. Stuart, President

The Honorable Dan Glickman
Secretary of Agriculture
U.S. Department of Agriculture
14th Street and Independence Avenue, S.W.
Washington, D.C. 20250

The Honorable Donna Shalala
Secretary of Health and Human Services
Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Secretary Glickman and Secretary Shalala:

Florida Fruit & Vegetable Association (FFVA) has worked diligently over the past year to assist growers, packers and shippers in the identification and mitigation of potential microbial hazards in the operation of their businesses. Providing safe, wholesome fruits and vegetables is of paramount importance to everyone involved in our industry.

Our membership was encouraged with the prospects of the President's food safety initiative when it was formally announced on October 2. Florida growers have long supported efforts to ensure that imported fruits and vegetables are held to the same standards required of domestic producers. Unfortunately, inspections of imported fruits and vegetables have not kept pace with the tremendous increases in trade we have seen over the past five years. We support the Administration's FY1999 budget request for an additional \$25 million to enhance the Food and Drug Administration's ability to inspect produce imports.

The development of another element of the initiative – guidance to minimize microbial food safety hazards for fresh fruits and vegetables – has generated several concerns within our membership.

- Too little is known about the introduction and transmission of food-borne pathogens in fresh fruits and vegetables. Appropriate research needs to be conducted to determine how, when and where contamination potentially occurs. This will ensure the most effective strategies can be developed to protect fresh fruits and vegetables as they move through the chain of commerce. Efforts then should be focused on those areas that are scientifically shown to be the source of potential hazards. Doing otherwise is, in our opinion, putting the cart before the horse.

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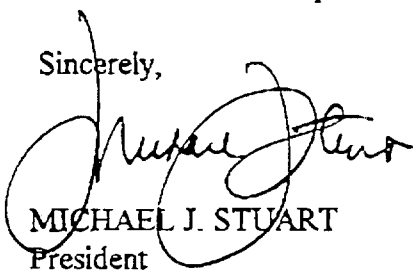
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- The draft guidance is not being developed in a vacuum. Growers continue to be concerned that FDA/USDA guidance will become de-facto regulations. The marketplace is watching this process closely, and it is likely buyers will require adoption of the document as a condition of doing business.
- The President's directive called for the issuance of good agricultural practices for fruits and vegetables, but said nothing about commodity-specific guidance. Given the diversity and complexity of the industry, the development of commodity-specific guidance would be impractical at best, and, at worst, potentially damaging to those products targeted. We urge the agencies not to pursue plans to develop commodity-specific guidance.
- Growers in Florida and elsewhere comply with a myriad of federal, state and local laws and regulations governing the production of their crops. Many of these requirements deal with health and sanitation practices on the farm and in the packing house. It is essential that the agencies not issue guidance that will conflict with those rules or create confusion in the industry.

We respectfully request both FDA and USDA to move cautiously and slowly with the whole concept of guidance, taking into account its implications on both production and the marketplace.

Enhancing the safety of fresh fruits and vegetables is an important goal that we fully support. As the various agencies pursue the implementation of the President's initiative, we would urge that you work closely with the industry to ensure that the effort does not impose unnecessary burdens or additional costs on producers.

Sincerely,



MICHAEL J. STUART
President

MJS:cgh

c: Deputy Secretary Rich Rominger/USDA
Under Secretary Catherine Woteki/USDA
Charles Rawls/USDA
Maureen Kelly/USDA
Dr. Michael A. Friedman/FDA
Dr. Fred Shank/FDA
Janice Oliver/FDA
Dr. Martha Roberts/FDACS

